

# **Exhibit A**

## **Rule 65(B) Certification**

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY  
LAW GROUP PC; JEFFREY J. JUDD;  
CHRISTOPHER R. HUMPHRIES; J&J  
CONSULTING SERVICES, INC., an Alaska  
Corporation; J&J CONSULTING  
SERVICES, INC., a Nevada Corporation; J  
AND J PURCHASING LLC; SHANE M.  
JAGER; JASON M. JONGEWARD; DENNY  
SEYBERT; and ROLAND TANNER;

Defendants,

THE JUDD IRREVOCABLE TRUST; PAJ  
CONSULTING INC; BJ HOLDINGS LLC;  
STIRLING CONSULTING, L.L.C.; CJ  
INVESTMENTS, LLC; JL2  
INVESTMENTS, LLC; ROCKING HORSE  
PROPERTIES, LLC; TRIPLE THREAT  
BASKETBALL, LLC; ACAC LLC;  
ANTHONY MICHAEL ALBERTO, JR.; and  
MONTY CREW LLC;

Relief Defendants.

Case No.: 2:22-cv-00612

**RULE 65(B) CERTIFICATION IN  
SUPPORT OF PLAINTIFF  
SECURITIES AND EXCHANGE  
COMMISSION'S *EX PARTE*  
APPLICATION FOR ENTRY OF  
TEMPORARY RESTRAINING ORDER  
AND ORDERS: (1) FREEZING  
ASSETS; (2) REQUIRING  
ACCOUNTINGS; (3) PROHIBITING  
THE DESTRUCTION OF  
DOCUMENTS; (4) GRANTING  
EXPEDITED DISCOVERY; AND (5)  
ORDER TO SHOW CAUSE RE  
PRELIMINARY INJUNCTION**

1 Tracy S. Combs, being sworn on oath, deposes and states that if called upon to do so, she  
2 could competently and truthfully testify as follows:

3 1. I am a Trial Counsel employed by the United States Securities and Exchange  
4 Commission in the Salt Lake Regional Office, located at 351 S. West Temple Street, Salt Lake  
5 City, Utah, 84101. I am a resident of Utah and licensed to practice law in California, New York,  
6 and Pennsylvania.

7 2. This certification is based upon specific facts contained in the Commission's  
8 Complaint and *Ex Parte* Application the accompanying brief, declarations and exhibits filed  
9 contemporaneously therewith. These submissions demonstrate that the Commission has made a  
10 *prima facie* showing that Defendants have participated in a securities investment fraud that  
11 violates the federal securities laws.

12 3. The Commission maintains that *ex parte* relief is appropriate in this matter. First,  
13 proceeding on an *ex parte* basis is warranted to increase the likelihood of freezing—and  
14 ultimately recovering—investor money or other assets in Defendants' and Relief Defendants'  
15 possession, custody and control. Second, it will help secure, and prevent destruction of,  
16 documents or other evidence of Defendants' scheme. If Defendants are given advance notice  
17 that the Commission is seeking emergency relief, they may dissipate any remaining assets and  
18 destroy documents and evidence.

19 4. Accordingly, for the reasons set forth above and in the Commission's supporting  
20 documents filed contemporaneously herewith, immediate and irreparable harm will result to the  
21 Commission and to at least one investor in the scheme unless this matter is heard *ex parte*. For  
22 these reasons, the undersigned counsel has not attempted to give advance notice to the  
23 Defendants or Relief Defendants, which advance notice should be excused in light of  
24 circumstances present.

1 Dated: April 12, 2022

Respectfully submitted,

3 /s/ Tracy S. Combs  
4 Tracy S. Combs (combst@sec.gov)  
5 Attorney for Plaintiff  
6 SECURITIES AND EXCHANGE COMMISSION  
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